

# Exhibit 4

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November 3, 2023

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VIA E-MAIL

Rita M. Glavin  
156 West 56<sup>th</sup> Street, Ste. 2004  
New York, New York 10019  
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Re: *Cuomo v. Boylan*, 23-MC-01587 (LDH) (TAM)

Dear Rita,

As set forth in Ms. Perry's letter dated October 29, 2023, your continued inquiries into the details of Ms. Boylan's document production to the OAG are irrelevant to the *Trooper 1* dispute and yet another example of Mr. Cuomo's ongoing attempts to misuse the discovery process to relitigate the OAG investigation. Your requests also directly contravene the Court's recent instructions to meet and confer to try and narrow—not expand—the scope of non-party discovery.

Again, you have a copy of the OAG's subpoena to Ms. Boylan and you have copies of the documents Ms. Boylan produced to the OAG that we voluntarily provided to you months ago. There is no need to engage any further in this meritless attempt to manufacture new and irrelevant discovery issues. However, we would be pleased to meet and confer—per the Court's instructions—to *narrow* the scope of your incredibly overbroad discovery directed at Ms. Boylan, although we note that to date you have made zero attempts to do so.

Sincerely,



JULIE R.F. GERCHIK  
for GLASER WEIL FINK HOWARD JORDAN & SHAPIRO LLP